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August 2021

Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership comment on Consultation on Temporary Desalination Plant for Sizewell C project

Commentary

The AONB Partnership makes the following comments on the consultation for a temporary (9-12 years) desalination plant, that may be moved between two sites within the nationally designated landscape.

The AONB Partnership are aware of concerns raised by several parties about the availability of a suitable water supply and is disappointed that a new element is being proposed at this stage. The AONB Partnership notes the short period for comment and a potential change process for the Development Consent Order.

The consultation indicates to the AONB Partnership that expert advice is not being given due weight by the applicant and that it further demonstrates that the scale of the proposals in this location is not suitable.

The proposals are likely to cause additional damage to the nationally designated AONB. The AONB Partnership considers that the lack of reference to the location of the proposals, in a nationally designated landscape, in the consultation document (August 2021) to be remiss.

Suffolk Coast & Heaths AONB Partnership

This consultation response is made on behalf of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership. The Partnership is made up of around 25 organisations which are committed to the purposes of the AONB designation, to conserve and enhance natural beauty. **For the avoidance of any doubt, some individual members of the Partnership are public bodies or statutory undertakers which have duties to conserve and enhance natural beauty and it is anticipated these members will provide separate representations reflecting their complete interests and responsibilities. Other Partnership members are likely to make their own representations reflecting their purposes.**

The AONB Partnership's main concerns are summarised below:

- 1) Time period of consultation**
- 2) Impact on defined qualities of the AONB**
- 3) Impact on the statutory purpose of the AONB**
- 4) Consideration of the AONB**
- 5) Other AONB issues**

1) Time period of consultation

The AONB Partnership consider that both the length and timing of the consultation to be unsatisfactory. For membership organisations such as the AONB Partnership, the ability to develop an informed response calling on the expertise of a wide range of partners, is compromised by the restriction on time made available (just 24 days) to respond to the

consultation, which if considered as a standalone proposal would be considered major development.

This is exaggerated by the timing of consultation, during the holiday period, and at a time when partners are required to respond to a second round of Examining Authority questions and developing Statements of Common Ground with the applicant on issues relating to the Sizewell C project.

Furthermore, many AONB Partnership organisations that would be expected to support the development of this consultation response, have their day to day duties to undertake and are not solely devoted to providing comment on Sizewell C matters. It is due to the potential impacts of the proposals that many partners have made time to develop this response at the expense of their core work.

2) Impact on the defined qualities of the AONB

The Suffolk Coast & Heaths AONB's natural beauty is defined by a series of features as agreed between the applicant, Suffolk Coastal District Council (now East Suffolk Council), Suffolk County Council and the AONB Partnership. These defined features are outlined in the *Natural Beauty and Special Qualities Indicators v1.8*¹

These defined features are based on Natural England's *Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England*² and include the following characteristics:

- Landscape quality
- Scenic quality
- Relative wildness
- Relative tranquillity
- Natural heritage features
- Cultural heritage

The AONB Partnership consider that the proposals:

- Do not conserve or enhance **landscape quality** as they do not contribute to the intactness of the visual function of the landscape, degrade the condition of natural landscape features and are an incongruous feature.
- Do not contribute to **scenic quality** by providing a distinctive sense of place, (as they introduce a built element into the AONB that does not contribute to the local vernacular.
- Do not contribute to **relative wildness** including a sense of remoteness, due the introduction of an industrial element during construction phase of up to 12 years.
- Do not contribute to **relative tranquillity** by the introduction of increased vehicle movements and noise of generators 24 hours a day for 7 days per week for up to 12 years.
- Do not contribute to the conservation or enhancement of **natural heritage features**

¹ Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB): Natural Beauty and Special Qualities Indicators <https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heath.pdf>

² Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England https://consult.defra.gov.uk/natural-england/suffolk-coast-and-heaths-aonb/supporting_documents/Guidance%20for%20assessing%20landscapes%20for%20designation%20as%20National%20Park%20or%20AONB%20in%20England.pdf

- Do not contribute to **cultural heritage** of the AONB due to the introduction of large building (10 m high)

3) Impact on statutory purpose of the AONB

The statutory purpose of an AONB is to conserve and enhance natural beauty. The AONB Partnership does not consider that this proposed development would contribute to the statutory purpose of the AONB.

4) Consideration of the AONB

The AONB Partnership are disappointed to see no reference to the nationally designated AONB or an indication of an assessment of the impact on the AONB in the applicant's Consultation Document: Consultation on Temporary Desalination Plant³

5) Other AONB issues

The AONB Partnership considers that:

- The use of a desalination plant is not an efficient use of resources and that the use of diesel generators to power the plant is unsustainable. The proposals, if built, would have a negative impact on local air quality and the defined tranquillity of the AONB. The consultation document refers to the National Policy Statement EN-1 about the nuclear industries role to diversify and decarbonise sources of electricity, the use of diesel generators for a period of up to 12 years would not appear compatible with this.
- The possibility of moving the desalination plant to a location away from the original proposed location to a position on higher ground in what appears to be an area of less developed AONB would introduce a new built element into the AONB for several years. This would not contribute to the purpose of the AONB designation. The desalination plant will not contribute to the purpose of the AONB at either the proposed location or the site it may be moved to.
- The proposals will require an increase in HGV movements for the delivery of plant and for a water supply for 9-12 months while the desalination plant is constructed (up to 40 deliveries per day, requiring 80 movements per day). It is acknowledged that this would be within the capped HGV limits but these proposals, if implemented would lead to an increase in HGV movements in the AONB, and therefore not contribute to its statutory purpose.
- If the applicant pursues an alternative strategy to bring in water supplies by sea, that will also impact the AONB. An assessment of relative impacts would be required to understand how any such alternative proposals would affect the nationally designated landscape.
- The introduction of diesel generators to power the proposed desalination plant would impact the defined qualities of tranquillity of the AONB.

The AONB Partnership consider the defined qualities of the AONB would be negatively impacted by the proposals for a desalination plant. This re-enforces the view that the overall proposals for the Sizewell C project are too large for this location and would have a significant detrimental effect on the AONB.

Simon Amstutz

AONB Manager, On behalf of Suffolk Coast & Heaths AONB Partnership

³ Consultation Document: Consultation on Temporary Desalination Plant

https://www.edfenergy.com/sites/default/files/sizewell_c_project_consultation_document_updated_v2-compressed.pdf